

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICHELLE J. KINNUCAN,

Plaintiff,

v.

NATIONAL SECURITY AGENCY, CENTRAL  
INTELLIGENCE AGENCY, AND  
DEPARTMENT OF DEFENSE,

Defendants.

Case No. 2:20-cv-1309 MJP

**PARTIES' STIPULATED MOTION AND  
ORDER TO EXTEND FILING  
DEADLINE FOR PLAINTIFF'S MOTION  
FOR FEES AND COSTS**

NOTE ON MOTION CALENDAR:  
September 28, 2023

**STIPULATED MOTION**

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Michelle Kinnucan ("Plaintiff") and Defendants National Security Agency, Department of Defense, and Central Intelligence Agency (collectively, "Defendants") move the Court for an order extending the time by which Plaintiff must file her motion for attorneys' fees and costs. Specifically, the Parties request an additional 60-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

Deadline	Current Date	Revised Date
Motion for Fees and Costs	October 13, 2023	December 12, 2023

Thus far, Plaintiff submitted a settlement offer on August 10, 2023, which Defendants are still reviewing. Therefore, there is good cause to extend this deadline because the parties are still currently negotiating a potential resolution and settlement, which if successful, would obviate the need for expenditure of further litigant and judicial resources. Good cause also exists because there is no prejudice towards any party. Accordingly, the Parties respectfully request the Court grant this Motion.

IT IS SO STIPULATED, THROUGH PARTIES OF RECORD

I certify that this paper contains 162 words, in compliance with Local Civil Rule 7(e)(1).

DATED this 28th day of September, 2023.

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*Attorneys for Plaintiff Michelle J. Kinnucan*

**ORDER**

**IT IS SO ORDERED.**

Dated this 29th day of September, 2023.



MARSHA J. PECHMAN  
United States Senior District Judge